

1 Amy Rose  
2 Nevada Bar 12081  
3 Lauren Kaufman  
4 Nevada Bar 14677C  
5 AMERICAN CIVIL LIBERTIES UNION OF NEVADA  
6 601 South Rancho Dr. Suite B-11  
7 Las Vegas, NV 89106  
8 Telephone 702-366-1536  
9 Fax 702-366-1331

10  
11 Alexandra Chrysanthis  
12 Nevada Bar 3231  
13 PRUDHOMME LAW OFFICES  
14 633 South 4th Street Suite 7  
15 Las Vegas, NV 89101  
16 alexandra@prudhommelawoffice.com  
17 Telephone 702-413-6100  
18 Fax 702-413-6664

19 Attorneys for Petitioner

20 UNITED STATES DISTRICT COURT

21 DISTRICT OF NEVADA

22 MOHAMMAD AL FALAHİ,

23 Case No.: 2:16-cv-02921

24 Petitioner,

25 **STIPULATION TO WITHDRAW AMY  
26 ROSE AS ATTORNEY OF RECORD**

27 vs.

28 UNITED STATES CITIZENSHIP AND

IMMIGRATION SERVICE, an entity,

Respondent.

20 Petitioner's counsel, Amy Rose's continued representation of Mohammad Al Falahi is  
21 no longer tenable as her permanent relocation to California has necessitated that she leave her  
22 position at the American Civil Liberties Union of Nevada.

24 Amy Rose has good cause to withdraw as counsel under the Nevada Rules of  
25 Professional Conduct 1.16(b), which provides that a lawyer may withdraw from representation  
26 where:  
27

28 (1) Withdrawal can be accomplished without material adverse effect on the

1                   interests of the client;

2                   ...

3                   (7) Other good cause exists

5                   The withdrawal of Amy Rose from this case can be accomplished without adverse effect  
6                   on the interests of the client because Amy Rose's withdrawal will not delay proceedings in this  
7                   matter. The Petitioner, Mohammad Al Falahi and the current staff attorney at the ACLU of  
8                   Nevada, Lauren Kaufman, have agreed to all current timelines pending in this action

10                  On May 15, 2019, Joseph Carilli, Jr., opposing counsel, stated that he did not oppose the  
11                  withdrawal of Amy Rose in the current matter.

13                  It is hereby stipulated and agreed that Amy Rose is no longer affiliated with the American  
14                  Civil Liberties Union of Nevada, and as such, hereby withdraws her appearance in the above-  
15                  captioned matter, and requests that: (1) her name be removed from any applicable service lists  
16                  herein; and (2) that the Clerk terminate the delivery of all notices addressed to [rose@aclunv.org](mailto:rose@aclunv.org)  
17                  in the above captioned case.

19                  All other current attorneys of the record shall continue to receive all applicable notices.

21                  Dated this 16th day of May, 2019

21                  Dated this 16th, day of May, 2019

23                  \_\_\_\_\_  
23                  /s/ Amy Rose  
23                  Amy Rose  
24                  Counsel for the Petitioner

23                  \_\_\_\_\_  
23                  /s/ Lauren Kaufman  
23                  Lauren Kaufman  
24                  Counsel for the Petitioner

25                  Dated this 15th, day of May, 2019

25                  Dated this 15th, day of May, 2019

27                  \_\_\_\_\_  
27                  /s/ Mohammad Al Falahi  
27                  Mohammad Al Falahi  
28                  Petitioner

27                  \_\_\_\_\_  
27                  /s/ Joseph Carilli  
27                  Joseph Carilli, Jr.  
28                  Counsel for the Respondent

IT IS SO ORDERED.

Stipulation

\_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE  
DATED: 5-17-2019

**CERTIFICATE OF SERVICE**

I hereby certify that on the 16th, day of May 2019, I caused to be served a true and correct copy of the Stipulation to Withdraw as Amy Rose as Attorney of Record to be served to all the parties listed below by U.S. mail postage pre-paid and through the Courts CM/ECF electronic filing system.

JOSEPH F. CARILLI, JR.  
N.H. Bar Identification No. 15311  
Trial Attorney  
United States Department of Justice  
Civil Division  
Office of Immigration Litigation  
District Court Section  
P.O. Box 868, Ben Franklin Station  
Washington, D.C. 20044  
Telephone: (202) 616-4848  
E-mail: [joseph.f.carilli2@usdoj.gov](mailto:joseph.f.carilli2@usdoj.gov)

/s/ Tamika Shauntee  
An employee of the ACLU of Nevada